

**Exhibit 22:** The April 18 and May 01, 2008 Letters from John Johnson



CITY OF DETROIT  
LAW DEPARTMENT

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April 18, 2008

Mr. William Goodman  
Goodman & Hurwitz, P.C.  
1394 E. Jefferson Avenue  
Detroit, Michigan 48207

Re: Detroit City Council Brown/Nelthrope Hearings

Dear Mr. Goodman:

During my testimony on Friday, April 11, 2008, you asked that I provide you with information regarding the case that involved the legislative branch of City government in which there was a confidentiality agreement.

Pursuant to your request, I have enclosed information pertaining to [REDACTED] (Wayne County Circuit Court Case [REDACTED]). The [REDACTED] matter was an employment case involving [REDACTED]. A confidentiality agreement is contained in the Settlement Agreement, which has been enclosed with this letter. I have also enclosed the Privileged and Confidential Settlement Memorandum and the Resolution as it appeared in the Journal of the City Council. Please note that [REDACTED]

Since last Friday, I have been advised that there is at least one other case involving [REDACTED] in which a confidentiality agreement was secured. I will forward that information on to you early next week.

Please do not hesitate to contact me with questions.

Sincerely,

  
John E. Johnson, Jr.  
Corporation Counsel

Enclosures

000214



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May 1, 2008

Mr. William H. Goodman  
Goodman & Hurwitz, P.C.  
1394 E. Jefferson Avenue  
Detroit, Michigan 48207

Dear Mr. Goodman:

Per our discussion last week, I am responding to your letter of April 22, 2008 with the following information:

1. Pursuant to the testimony given at the Detroit City Council hearings, the majority of the settlement agreements in the Labor & Employment Section contain confidentiality provisions. All parties agree to this provision. Per your request, examples are enclosed.
2. There may be one or two cases in which the confidentiality agreement was separate from the settlement agreement. However, the actual case names(s) could not be located.
3. We have determined that, during the past five years, at least 10 post-verdict settlements have been submitted to the City Council. I have already forwarded six of those matters to your attention. I have enclosed information below that details the facts and circumstances surrounding the other four.<sup>1</sup>

Additionally, you indicated that you would receive information from the Law Department in regards to suggestions and/or protocol that might be implemented in the future to provide more information to the Council regarding proposed settlements.

We feel that the most direct and comprehensive method of providing information would be through the scheduling of a Closed Session designed to discuss settlement strategy and negotiations.

000215

- 1 [REDACTED] (Verdict: \$1,156,492; settlement: [REDACTED])  
[REDACTED] (Verdict: \$200,000; settlement: [REDACTED] which included interest and attorney fees)  
[REDACTED] (Verdict: \$250,000; settlement: [REDACTED] no interest or attorney fees)  
[REDACTED] (verdict: \$50,000; settlement: [REDACTED] including interest and attorney fees)

William H. Goodman  
May 1, 2008  
Page Two

Important criteria for scheduling such a Closed Session might be cases that involve:

1. A case evaluation award and/or a pre-trial settlement amount of more than \$2 million;
2. Significant public and governmental policy implications;
3. Sensitive information produced in litigation that relates to the internal administration of the City of Detroit;
4. Significant media attention that may impact case evaluation, settlement negotiations, jury selection and/or trial verdict.

We suggest that a case involving one or more of these criteria should automatically be accompanied by a request for a Closed Session.

Obviously, a Closed Session would not preclude the right of any Council member to submit written questions that would be answered prior to approval.

Thank you for the opportunity to provide this input. Please do not hesitate to call me with questions or comments.

Sincerely,



John E. Johnson, Jr.  
Corporation Counsel

Enclosures

000216